

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS

WORCESTER, ss.

|                      |   |                       |
|----------------------|---|-----------------------|
| _____                | ) |                       |
| In re:               | ) |                       |
|                      | ) | Involuntary Chapter 7 |
| WESTBOROUGH SPE LLC, | ) | Case No. 23-40709     |
|                      | ) |                       |
| Debtor.              | ) |                       |
| _____                | ) |                       |

MOTION AND ANSWER TO PETITION FOR  
INVOLUNTARY BANKRUPTCY

I, Lolonyon Akouete, in my capacity as the manager of Westborough SPE LLC, the debtor in the above-captioned case, hereby file this Motion and Answer in response to the summons and the petition for involuntary bankruptcy filed against our entity under Title 11 of the United States Code on August 31, 2023.

**Background and Introduction:**

1. On August 31, 2023, a petition under Title 11 of the United States Code was filed against Westborough SPE LLC, seeking an order for relief under chapter 7 of the Bankruptcy Code.

**Motion to Acknowledge and Cooperate:**

2. We hereby acknowledge the receipt of the summons dated September 1, 2023. As the authorized representative of Westborough SPE LLC, we do not object to the involuntary bankruptcy filing.

**Answer to the Petition:**

3. We recognize the allegations presented in the petition and confirm our consent to the involuntary bankruptcy filing. We understand the nature and implications of this proceeding and are prepared to cooperate fully with the Court and all parties involved.
4. We affirm that the financial situation of Westborough SPE LLC necessitates the chapter 7 bankruptcy filing. We have reviewed the entity's financial obligations, assets, and liabilities, and understand the importance of an organized and efficient resolution of its debts.
5. We commit to working closely with the Court-appointed trustee, creditors, and all relevant parties to facilitate the bankruptcy process for Westborough SPE LLC. We will provide all necessary documentation and information to ensure a fair and accurate assessment of the entity's financial affairs.
6. We understand the significance of our cooperation to the successful administration of this case and the equitable treatment of all creditors involved. We will adhere to the rules and procedures

of the Bankruptcy Code and will diligently fulfill our obligations as representatives of Westborough SPE LLC throughout the bankruptcy proceedings.

**Conclusion:**

7. We respectfully request the Court's consideration of this Motion and Answer, and we express our gratitude for its attention to this matter and commitment to a just resolution of the proceedings.
8. Should the Court require any additional information, clarification, or documentation regarding Westborough SPE LLC's response, please do not hesitate to contact us at (443) 447-3276 or [info@smartinvestorsllc.com](mailto:info@smartinvestorsllc.com).

DATED: September 5, 2023

Respectfully submitted:

WESTBOROUGH SPE, LLC  
By its manager,



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Lolonyon Akouete  
Manager of Westborough SPE, LLC  
1241 Deer Park Ave., Suite 1, #1051  
North Babylon, NY 11703  
[info@smartinvestorsllc.com](mailto:info@smartinvestorsllc.com)  
(443) 447-3276

**CERTIFICATE OF SERVICE**

I, Lolonyon Akouete, manager for the Debtor, hereby certify that the above document is served by email and mailing a copy of the same, first-class mail, to the following:

Stephen F. Gordon, Attorney of the Petitioners  
(Email: [sgordon@gordonfirm.com](mailto:sgordon@gordonfirm.com))  
The Gordon Law Firm LLP  
River Place 57 River Street Wellesley, MA 02481

Scott A. Schlager on behalf of,  
Nathanson & Goldberg, P.C., a creditor.  
(Email: [sas@natgolaw.com](mailto:sas@natgolaw.com))  
183 State Street, 5th Floor Boston, MA 02109

WESTBOROUGH SPE, LLC  
By its manager,



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